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Bankruptcy Counsel to Lead Plaintiff and the Class

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

AMENDED NOTICE OF SECURITIES LEAD PLAINTIFF'S MOTION TO APPLY BANKRUPTCY RULE 7023 TO CLASS PROOF OF CLAIM

Date: January 29, 2020
Time: 10:00 a.m. (Pacific Time)
Before: Hon. Dennis Montali,
United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Objection Deadline: January 14, 2020 at 4:00 p.m.
(Pacific Time)

1 **PLEASE TAKE FURTHER NOTICE** that on January 29, 2019, PG&E Corporation and
2 Pacific Gas and Electric Company, the debtors in possession (the “**Debtors**”) in the above-
3 captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief
4 under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United
5 States Bankruptcy Court for the Northern District of California (San Francisco Division) (the
6 “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold an omnibus
8 hearing on January 29, 2020 at 10:00 a.m. (Pacific Time) (the “**Omnibus Hearing**”) in the
9 courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th
10 Floor, 450 Golden Gate Avenue, San Francisco, California 94102.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters scheduled
12 for the Omnibus Hearing, the Bankruptcy Court is scheduled to hear *Securities Lead Plaintiff’s*
13 *Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* (the “**Motion**”), which was filed
14 by Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-
15 appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation*
16 *Securities Litigation*, Case No. 18-03509 (N.D. Cal.), on December 9, 2019.

17 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Order Approving Stipulation
18 Regarding Scheduling With Respect to Securities Lead Plaintiff’s Motion to Apply Rule 7023 to
19 Class Proof of Claim [ECF No. 5042], entered on December 27, 2019 as ECF No. 5211, the
20 Debtors shall have until January 14, 2020 at 4:00 p.m. (Pacific) to file their objection, if any, to
21 the Motion. Oppositions or responses to the Motion must be in writing, filed with the Bankruptcy
22 Court, and served on the counsel for Lead Plaintiff at the above-referenced addresses so as to be
23 received by no later than January 14, 2020 at 4:00 p.m. (Pacific). Any oppositions or responses
24 must be filed and served on all “Standard Parties” as defined in, and in accordance with, the *Second*
25 *Amended Order Implementing Certain Notice and Case Management Procedures* entered on May
26 14, 2019 [ECF No. 1996] (the “**Case Management Order**”). Any relief requested in the Motion
27 may be granted without a hearing if no opposition is timely filed and served in accordance with
28 the Case Management Order. In deciding the Motion, the Court may consider any other document

1 filed in these Chapter 11 Cases and related Adversary Proceedings.

2 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
3 papers can be viewed and/or obtained: (i) by accessing the Court's website at
4 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
5 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
6 Clerk LLC, at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
7 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
8 pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the
9 Bankruptcy Court's website.

10 Dated: December 27, 2019

11 Respectfully submitted,

12 **LOWENSTEIN SANDLER LLP**
13 **MICHELSON LAW GROUP**

14 By: /s/ Randy Michelson
15 Randy Michelson (SBN 114095)

16 *Bankruptcy Counsel to Lead Plaintiff and the Class*
17 - and -

18 **LABATON SUCHAROW LLP**

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23 *Liaison Counsel for the Class*
24 - and -

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26 *Counsel for the Securities Act Plaintiffs*
27 - and -

28 **VANOVERBEKE, MICHAUD & TIMMONY,**
29 **P.C.**

30 *Additional Counsel for the Securities Act Plaintiffs*

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Additional Counsel for the Securities Act Plaintiffs

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